ATTACHMENT

1. Currently, the National Verifier has launched, but does not have access to a state database, in the following 16 states, territories, and district: Alaska, American Samoa, Delaware, the District of Columbia, Guam, Hawaii, Idaho, Maine, Montana, New Hampshire, North Dakota, the Northern Mariana Islands, Rhode Island, South Dakota, the U.S. Virgin Islands, and Wyoming. However, the National Verifier does have access to the Federal Public Housing Assistance database in these jurisdictions. It will also have access to any future federal database connections that are established, including the Centers for Medicare and Medicaid Services database. The Universal Service Administrative Company (USAC) has recently been in contact with these jurisdictions and is willing to work with any state, territory, or district interested in establishing a connection.

2. The National Verifier performs multiple checks—it confirms an applicant's identity and address information, checks for duplicate applications or existing subscribership, and verifies the applicant's eligibility for the Lifeline program. It does not automatically enroll applicants in the Lifeline Program. After identity, non-duplication, and eligibility have been confirmed, Lifeline applicants can then select a Lifeline service provider to begin receiving Lifeline benefits.

    The National Verifier rollout process has two parts—an initial, or soft, launch period and then a full, or hard, launch period. During the soft launch, Lifeline applications can be submitted either through the National Verifier or through the applicant's service provider. After the hard launch, applicants are required to apply for Lifeline through the National Verifier. Neither the FCC nor USAC has data on the applications submitted to service providers during soft launches.

    As the National Verifier does not automatically enroll consumers in the Lifeline program, applicants are not denied Lifeline benefits simply because the National Verifier does not have an automated connection with the applicant's qualifying program. Rather, if eligibility cannot be verified using an automated connection, the National Verifier asks the applicant to submit additional documentation so that USAC may manually review the applicant's eligibility.

    Table 1 below provides (1) the full launch date for each National Verifier state; (2) the number of applications received by the National Verifier in each state; (3) the number and percentage of applications approved by the National Verifier after conducting eligibility, identity, deceased, address, and duplicate checks; and (4) the number and percentage of applications that were approved via a manual review. Manual review is required after an application fails one or more automated checks of the applicant's eligibility, identity, address, status as deceased or alive, or status as a non-duplicative Lifeline account. Table 1 captures data through March 31, 2019.

Table 1. Applications Approved Through the National Verifier

State	Launch Date	Applications Submitted	Applications Approved	Approval Rate	Applications Approved After Manual Review	Approval Rate for Manual Review
AK	5/7/2019	77	17	22%	17	22%
AS	5/7/2019	3	0	0%	0	0%
CO	11/2/2018	10,927	7,874	72%	668	18%
DC	5/7/2019	3	0	0%	0	0%
DE	5/7/2019	22	4	18%	3	14%
GU	1/15/2019	133	77	58%	62	53%
HI	1/15/2019	1,622	423	26%	340	22%
ID	1/15/2019	2,034	529	26%	472	24%
ME	5/7/2019	17	4	24%	3	19%
MO	3/5/2019	2,943	1,904	65%	130	11%
MP	5/7/2019	6	1	17%	1	17%
MS	11/2/2018	20,735	10,379	50%	2,215	18%
MT	11/2/2018	1,323	541	41%	522	40%
NC	3/5/2019	7,064	4,162	59%	434	13%
ND	1/15/2019	891	376	42%	321	38%
NH	1/15/2019	1,496	528	35%	438	31%
NM	11/2/2018	21,227	15,442	73%	2,420	29%
PA	3/5/2019	8,275	5,021	61%	862	21%
RI	5/7/2019	27	10	37%	10	37%
SD	1/15/2019	885	427	48%	381	45%
TN	3/5/2019	5,907	3,347	57%	338	12%
UT	11/2/2018	7,596	4,343	57%	1,050	24%
VI	5/7/2019	2	0	0%	0	0%
WY	11/2/2018	169	43	25%	38	23%
Total	-	93,384	55,452	59%	10,725	22%

3. As explained above, the National Verifier does not automatically enroll consumers in the Lifeline program. If eligibility cannot be verified using an automated connection, the National Verifier asks the applicant to submit additional documentation so that USAC may manually review the applicant's eligibility. Applicants have 45 days to submit the required documents either through the mail or through the online portal. Once the supporting documents are submitted, USAC manually reviews the documents and determines eligibility. For applications that are ultimately deemed qualified, the manual review process takes an average of 8 days from the date the consumer begins the application, including time taken by the consumer to complete the application.

The National Verifier has two types of manual reviews: non-real-time and real-time reviews. Real-time manual review of documentation occurs for documents submitted during regular service center operating hours through one of the National Verifier's online portals. USAC completes these manual reviews, on average, in about 6 minutes. The response is immediately provided via the online portal.

Non-real-time review of documentation occurs for mailed-in documents and for documents submitted on one of the National Verifier portals (the service provider portal or the consumer portal) outside service center operating hours. USAC normally reviews these within two business days, and USAC confirmed that it has consistently met this timeframe. After the documents are reviewed, USAC contacts the consumer, either by U.S. Postal Service or through an online portal, within two days.

4. Part of the National Verifier launch process is reverification—that is, the National Verifier confirms that an existing Lifeline subscriber is still eligible for the Lifeline program before finalizing the record in the National Verifier's system. This one-time process begins with the National Verifier attempting to verify each subscriber's eligibility via any available databases. If a subscriber cannot be verified through an eligibility database, the National Verifier requests and reviews any recent eligibility documentation from the service provider. If a subscriber cannot be verified using a database and the service provider does not have acceptable recent eligibility documentation on file, the National Verifier then contacts the subscriber directly to request documentation demonstrating eligibility.

After reviewing the reverification results from the first six states where the National Verifier was launched, USAC has modified the reverification process and its timeline to ensure that subscribers are given ample opportunity to submit eligibility documentation. USAC determined that not all carriers are fulfilling their obligation to reach out to their subscribers to request necessary eligibility documentation during the reverification process. Accordingly, USAC has taken steps to conduct this outreach itself to ensure the subscriber is aware of the reverification process and has an opportunity to demonstrate their current eligibility for the Lifeline program.

Table 2 below provides (1) the number of subscribers in each state that are undergoing reverification and (2) the number and percentage of subscribers who failed the automated eligibility check and for whom the service provider did not have recent eligibility documentation on file (i.e., the subscribers required to submit proof of program eligibility and a new certification to be reverified). Table 2 captures data through March 31, 2019. This data only includes existing subscribers in the 16 states in which the National Verifier had fully launched. Reverification has not yet begun in the following states and territories enrolled in the National Verifier: Alaska, American Samoa, the District of Columbia, Delaware, Indiana, Kentucky, Maine, Michigan, the Northern Mariana Islands, Rhode Island, and the U.S. Virgin Islands.

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Table 2. Reverification of Existing Lifeline Subscribers as of March 2019

State	Subscribers Being Reverified	Subscribers Required to Submit Documentation	% Subscribers Required to Submit Documentation
CO	60,285	8,876	15%
GU	842	323	38%
HI	8,195	3,124	38%
ID	15,408	10,777	70%
MO	103,429	23,420	23%
MS	72,635	25,329	35%
MT	4,151	3,113	75%
NC	233,422	41,525	18%
ND	4,730	3,227	68%
NH	9,558	6,526	68%
NM	82,471	11,226	14%
PA	398,037	59,297	15%
SD	7,291	4,888	67%
TN	207,481	61,508	30%
UT	22,172	7,481	34%
WY	1,411	1,322	94%
Total	**1,231,518**	**271,962**	**22%**